

Moffa Exhibit 4

From: [William Ramey](#)
To: [McCabe, William J. \(NYC\)](#)
Cc: [Tina Hueske](#); [Moffa, Matthew \(NYC\)](#); [Delona Laxton](#)
Subject: RE: Traxcell v. Nokia et al.
Date: Thursday, February 21, 2019 12:27:14 PM
Importance: High

Bill,

Thank you for the e-mail. We think the infringement contentions are proper.

Also, we have some indication that we served your client.

We are not prepared to dismiss. We have fully kept you aware of the filings.

Bill

William P. Ramey, III
Ramey & Schwaller, LLP
5020 Montrose Blvd., Suite 750
Houston, Texas 77006
Tele. [713-426-3923](tel:713-426-3923)
Direct. [832-581-4221](tel:832-581-4221)
Fax [832-900-4941](tel:832-900-4941)
Cell [713-857-6005](tel:713-857-6005)
wramey@rameyfirm.com
www.rameyfirm.com

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From: McCabe, William J. (Perkins Coie) <WMcCabe@perkinscoie.com>
Sent: Monday, February 18, 2019 11:44 AM
To: William Ramey <wramey@rameyfirm.com>
Cc: Tina Hueske <thueske@rameyfirm.com>; Moffa, Matthew (Perkins Coie) <MMoffa@perkinscoie.com>
Subject: Traxcell v. Nokia et al.

Bill,

Thanks for speaking with me last week.

As I mentioned on the call, you appear to have joined HMD Global Oy improperly with the Nokia defendants. Also, you have been trying to serve a non-existent entity, "HMD Global," and have not yet served the named party HMD Global Oy. From the docket it appears that you waited to send papers to "HMD Global" until two months after sending a waiver of service to Nokia, and have not

yet sent even requested a summons for HMD Global Oy. Finally, the infringement contentions you sent us appear to be directed only to Nokia, and do not identify any infringing acts by HMD. (Are you sure you provided the right contention document?)

We do not agree to waive service while we are improperly joined in this case. We suggest that you file a consent motion to sever HMD Global Oy from this suit; or, if you prefer, you can dismiss HMD Global Oy from this suit and file a new suit against it. In either event, we would agree to thereafter waive service for HMD Global Oy in the new suit, but only if you ensure that we receive infringement contentions specifically directed to HMD *and* get some additional time to serve our invalidity contentions. The local rules anticipate service of invalidity contentions 45 days after service of infringement contentions. We propose that our invalidity contentions be due 90 days after you serve proper infringement contentions in the new suit alleging infringement by HMD.

Let us know if you agree with this approach.

Regards,

Bill

William McCabe | Perkins Coie LLP

PARTNER

30 Rockefeller Plaza 22nd Floor

New York, NY 10112-0015

D. +1.212.261.6829

M. +1 914 393-7402

F. +1.212.977.1639

E. WMcCabe@perkinscoie.com

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